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Attorney for Defendant  
JONATHAN FLORES

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. CR 19-0584 RS
	)	
Plaintiff,	)	STIPULATION AND ORDER
	)	CONTINUING CASE FROM OCTOBER 20,
v.	)	2020 TO NOVEMBER 3, 2020, AND
	)	EXCLUDING TIME FROM OCTOBER 20,
JONATHAN FLORES,	)	2020 TO NOVEMBER 3, 2020 UNDER THE
	)	SPEEDY TRIAL ACT
Defendant.	)	

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**STIPULATION**

At the request of the defense and with no objection from the government, the defense requests that the status date of October 20, 2020 be continued to November 3, 2020 in order to allow defense counsel additional time to conduct investigation, meet with her client, and engage in settlement discussions with government counsel.

The parties submit that the time between October 20, 2020 and November 3, 2020 should be excluded based on effective preparation of counsel. 18 U.S.C. § 3161(h)(7)(B)(iv). The parties stipulate that the ends of justice served by the continuance outweigh the best interests of the public and the

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1 defendant in a speedy trial.

2 IT IS SO STIPULATED.

3  
4 DATED: October 16, 2020

\_\_\_\_\_  
5 SHAWN HALBERT  
6 Counsel for Jonathan Flores

7 DATED: October 16, 2020

8 DAVID L. ANDERSON  
9 United States Attorney

\_\_\_\_\_  
10 /s/  
11 CHRISTINA LIU  
12 Assistant United States Attorney

13 Attestation of Filer

14 I attest that I have the permission of the other signatories to this document to enter conformed  
15 signatures on their behalf and to file the document.

16 DATED: October 16, 2020

\_\_\_\_\_  
17 /s/  
18 SHAWN HALBERT  
19 Counsel for Jonathan Flores

**ORDER**

For the reasons stated herein, IT IS HEREBY ORDERED that the status date of October 20, 2020 shall be continued to November 3, 2020 and that a time exclusion between October 20, 2020 and November 3, 2020 is warranted, and the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). The failure to grant the requested continuance would deny the defendant effective preparation of counsel and would result in a miscarriage of justice, and the continuance is appropriate given the status of the case. 18 U.S.C. § 3161(h)(7)(B)(ii) and (iv).

IT IS SO ORDERED.

DATED: October 19, 2020



HONORABLE RICHARD SEEBORG  
United States District Judge